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| Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Richard M. Pachulski 62337 Pachulski Stang Ziehl & Jones LLP 10100 Santa Monica Boulevard, Suite 1300 Los Angeles, CA 90067 Tel: (310) 277-6910 Fax: (310) 201-0760 Email: rpachulski@pszjlaw.com <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Civic Real Estate Holdings III, LLC | FOR COURT USE ONLY |
| UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION | |
| In re: CHANTILLY ROAD, LLC Debtor(s). | CASE NO.: 8:25-bk-11409-SC CHAPTER: 7 APPLICATION FOR ORDER SETTING HEARING ON SHORTENED NOTICE [LBR 9075-1(b)] |

1. Movant applies under LBR 9075-1(b) for an order setting a hearing on shortened notice on the following motion:

a. Title of motion: Motion for Relief From the Automatic Stay

b. Date of filing of motion: July 8, 2025

2. Compliance with LBR 9075-1(b)(2)(A): (***The following three sections must be completed***):

a. Briefly specify the relief requested in the motion:

Civic Real Estate Holdings III, LLC ("Civic") holds the senior lien against real property located at 1116 Chantilly Road, Los Angeles, CA 90077 (the "Property"), and seeks relief from stay in order to enforce its state law rights and remedies against the Property.

- b. Identify the parties affected by the relief requested in the motion:

The debtor and the petitioning creditors for the involuntary Chapter 7 proceeding.

- c. State the reasons necessitating a hearing on shortened time:

A motion for relief from stay was filed on June 20, 2025 in this proceeding by CSPRF 2 LLC, one of the petitioning creditors (Dkt. No. 7). That motion sets forth that CSPRE 2 LLC holds a junior secured claim of \$3,376,938.77 against the Property. CSPRE 2 also filed a motion for order shortening time for hearing on its motion for relief from stay. It posits that the Property is worth \$21 million and that its alleged equity cushion is rapidly diminishing on account of Civic's claim, which was \$17,701,121 as of June 13, 2025.

Civic's concurrently filed motion for relief from stay points out that, even if the Property were worth \$21 million, its already thin equity cushion must be further reduced by Los Angeles' "mansion tax" of 5.5%, meaning that to the extent Civic has any equity cushion at all, it will soon be completely dissipated.

Accordingly, Civic requests that the hearing on its motion for relief from stay be held at the same time set by the Court for the hearing on CSPRE 2's motion.

3. Compliance with LBR 9075-1(b)(2)(B): The attached declaration(s) justifies setting a hearing on shortened notice, and establishes a *prima facie* basis for the granting of the motion.
4. Movant has lodged a proposed Order Setting Hearing on Shortened Notice on mandatory form F 9075-1.1.ORDER.SHORT.NOTICE

Date: July 8, 2025

PACHULSKI STANG ZIEHL & JONES LLP

Printed name of law firm

/s/ Richard M. Pachulski

Signature of individual Movant or attorney for Movant

RICHARD M. PACHULSKI

Printed name of individual Movant or attorney for Movant

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10 Attorneys for Civic Real Estate Holdings III,
11 LLC

12 **UNITED STATES BANKRUPTCY COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **SANTA ANA DIVISION**

15 In re
16 CHANTILLY ROAD, LLC,
17 Debtor.

Case No. 8:25-BK-11409

Chapter 7

**DECLARATION OF HARRY D.
HOCHMAN IN SUPPORT OF MOTION
FOR ORDER SHORTENING TIME FOR
HEARING ON MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

Date: [Application for Order Shortening
Time Filed Herewith]
Judge: Hon. Scott C. Clarkson

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20 I, Harry D. Hochman, declare as follows:

21 1. I am senior counsel to Pachulski Stang Ziehl & Jones LLP, counsel to creditor
22 Civic Real Estate Holdings III, LLC (“Civic”) in this matter. I am an attorney duly admitted to
23 practice in this district, and make this declaration in support of Civic’s *Motion for Order*
24 *Shortening Time for Hearing on Motion for Relief From the Automatic Stay*. If called upon to do
25 so, I could and would testify competently to the following facts.

26 2. A motion for relief from stay was filed on June 20, 2025 in this proceeding by
27 CSPRF 2 LLC, one of the petitioning creditors (Dkt. No. 7). That motion sets forth that CSPRE 2
28 LLC holds a claim of \$3,376,938.77 secured by a junior lien on property located at 1116 Chantilly

1 Road, Los Angeles, California (the “Property”). It acknowledges that the senior lien is held by
2 Civic, which filed a proof of claim in the dismissed chapter 11 case in the amount of
3 \$16,304.367.68, as of December 15, 2024, increasing by approximately \$7,552.50 per day. That
4 claim is based upon a loan that matured on August 24, 2024, in respect of which Civic recorded a
5 Notice of Default on September 30, 2024. Civic asserts a senior secured claim of \$17,701,121 as
6 of June 13, 2025.

7 3. CSPRF 2 has filed a motion for order shortening time for hearing on its motion for
8 relief from the automatic stay (Dkt. No. 8). It posits that the Property is worth \$21 million and so
9 any equity cushion it may have is rapidly diminishing on account of Civic’s far larger senior
10 claim.

11 4. Concurrent herewith, Civic has filed a motion for relief from the automatic stay.
12 As set forth in Civic’s motion, even if the Property were worth \$21 million, its already thin equity
13 cushion must be further reduced by Los Angeles’ “mansion tax” of 5.5%, meaning that any equity
14 cushion will soon be completely dissipated.

15 5. Accordingly, Civic requests that its motion for relief from the automatic stay
16 should be heard concurrently with CSPRF 2’s motion, and so should be scheduled for whatever
17 date the Court sets for hearing on CSPRF 2’s motion.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct, and that this Declaration is executed on this 8th day of July, 2025, at
20 Los Angeles, California.

21
22 /s/ Harry D. Hochman
23 HARRY D. HOCHMAN
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
10100 Santa Monica Boulevard, Suite 1300, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled: **APPLICATION FOR ORDER SETTING HEARING ON SHORTENED NOTICE [LBR 9075-1(b)]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* July 8, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **D Edward Hays** ehays@marshackhays.com, ehays@ecf.courtdrive.com; alinares@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
- **Gabriel P Herrera** gherrera@kmtg.com, bxiong@kmtg.com
- **Harris M Madnick** hmmadnick@kramarmadnick.com
- **Richard Morin** legal@rickmorin.net
- **Laila Rais** lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; lbuchanan@marshackhays.com; alinares@ecf.courtdrive.com
- **United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On *(date)* _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* July 8, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Via Personal Delivery

Honorable Scott Clarkson, U.S. Bankruptcy Judge
United States Bankruptcy Court, Central District of California
Ronald Reagan Federal Building and Courthouse
411 West Fourth Street, Suite 5130 / Courtroom 5C
Santa Ana, CA 92701-4593

Via Email:

Richard Morin, Attorney for Debtor
Email: legal@rickmorin.net

Gabriel P. Herrera, Attorney for CSPRF 2 LLC
Email: gherrera@kmtg.com

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 8, 2025
Date

Myra Kulick
Printed Name

/s/ Myra Kulick
Signature

This form is optional. It has been approved for use in the United States Bankruptcy Court for the Central District of California.